Ms. Judy Witkemper
KYB Manufacturing North America, Inc.
2625 North Morton
Franklin, Indiana 46131

Re: 081-15647
Notice-only change to
MSOP 081-12622-00015

Dear Ms. Witkemper:

KYB Manufacturing North America, Inc. was issued a Minor Source Operating Permit on December 21, 2001 for chrome plating plant used to manufacture piston rods for automobile struts. A letter notifying the Office of Air Quality of a change in the permit was received on March 1, 2002. The change which corrects the typographical errors in the permit qualifies as a Notice-Only Change, pursuant to 326 IAC 2-6.1-6(d).

Condition D.1.7 of the issued MSOP referenced a pressure drop range of 1.95 inches and 2.95 inches of water across the composite mesh pad system on electroplating line P-1, and a pressure drop range of 3.20 inches and 4.20 inches of water across the composite mesh pad system on electroplating line P-2. These pressures drop ranges were established during an initial performance testing to demonstrate compliance with the requirements of the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR Part 63, Subpart N. These pressure drop ranges however, were changed by US. EPA as requested by the source due to control equipment improvements and as demonstrated in another performance tests. U.S. EPA approved 1.65 - 3.65 inches of water at P-1 and 3.0 - 5.0 inches of water at P-2. The pressure drop ranges referenced in Condition D.1.7 do not match the pressure drop ranges approved by U.S. EPA. Therefore, Condition D.1.7 will be revised as follows (changes are bolded and deletions are struck-through for emphasis):

D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344] [326 IAC 20-8-1]

(a) A performance test demonstrating initial compliance for tanks in electroplating lines P-1 and P-2 were performed on March 18, 1997 and September 9, 1997, respectively.

During the initial performance tests, it was determined that the pressure drop across the composite mesh pad system on electroplating line P-1 was between 1.95 inches and 2.95 inches of water and the pressure drop across the composite mesh pad system on electroplating line P-2 was between 3.20 inches and 4.20 inches of water. As approved by U.S. EPA on February 6, 1998, the pressure drops were revised to between ~~2.65~~ **1.65** inches and 3.65 inches of water for the composite mesh pad on electroplating line P-1 and between ~~4.00~~ **3.00** inches and 5.00 inches of water for the composite mesh pad on electroplating line P-2.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Johnson County
U.S. EPA, Region V
Johnson County Health Department
Air Compliance Section Inspector - Vaughn Ison
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

NEW CONSTRUCTION PERMIT
AND MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

KYB Manufacturing North America, Inc.
2625 North Morton
Franklin, Indiana 46131

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 081-12622-00015	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 21, 2001
1st Notice-Only Change No.: 081-15647	Pages Affected: 19
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAQ.

(e) The Permittee shall keep the written OMP on record after it is developed to be made ava ilable, upon request, by IDEM, OAQ for the life of tanks on electroplating lines P-1, P-2 and P-3, or until the tank is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMPs on record to be made available for inspection, upon request by IDEM, OAQ for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.7 Performance Testing [326 IAC 2-1.1-11] [40 CFR 63.343(b)(2)] [40 CFR 63.7] [40 CFR 63.344] [326 IAC 20-8-1]

(a) A performance test demonstrating initial compliance for tanks in electroplating lines P-1 and P-2 were performed on March 18, 1997 and September 9, 1997, respectively.

During the initial performance tests, it was determined that the pressure drop across the composite mesh pad system on electroplating line P-1 was between 1.95 inches and 2.95 inches of water and the pressure drop across the composite mesh pad system on electroplating line P-2 was between 3.20 inches and 4.20 inches of water. As approved by U.S. EPA on February 6, 1998, the pressure drops were revised to between 1.65 inches and 3.65 inches of water for the composite mesh pad on electroplating line P-1 and between 3.00 inches and 5.00 inches of water for the composite mesh pad on electroplating line P-2.

(b) The Permittee is not required to further test tanks in electroplating lines P-1 and P-2 by this permit. However, the IDEM may require testing when necessary to determine if the tanks are in compliance. If testing is required by the IDEM, compliance with the limits specified in Condition D.1.3 shall be determined by a performance test conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

(c) The Permittee is required to conduct an initial performance test within 180 days after startup of tanks in electroplating line P-3 using the procedures and methods in 40 CFR 63.344 and 40 CFR 63.7 and in accordance with Section C - Performance Testing.

(d) Any change, modification, or reconstruction of the tanks in electroplating lines P-1, P-2, and P-3, the composite mesh pads, wet scrubber, or monitoring equipment may require additional performance testing conducted in accordance with 40 CFR 63.344 and Section C - Performance Testing.

D.1.8 Establishing Site-Specific Operating Parameter Values [40 CFR 63.343(c)] [40 CFR 63.344(d)] [326 IAC 20-8-1]

During the initial performance test for electroplating line P-3 and pursuant to 40 CFR 63.343(c)(1)(i), when using a composite mesh-pad system to comply with the limit specified in Condition D.1.3, the Permittee shall determine the outlet chromium concentration using the test methods in 40 CFR 63.344(c) and shall establish as a site-specific operating parameter the pressure drop across the system, setting the value that corresponds to compliance with the applicable emission limitation using the procedures in 40 CFR 63.344(d)(4) and (5). The Permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test, and accept ±1 inch of water column from this value as the compliant range.